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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

GABRIEL BALANAG)	Case No: 10-20425
)	MOTION TO
AIDA BALANAG)	COMPEL ABANDONMENT OF ASSETS
)	OF THE ESTATE VEHICLES
Debtor.)	TJW-2
)	DATE: JUNE 23, 2010
)	TIME: 9:30 AM
)	DEPT C
		COURTROOM 35
		JUDGE CHRISTOPHER M. KLEIN
		11USC554

DEBTOR'S MOTION TO COMPEL TRUSTEE TO ABANDON ASSETS OF THE ESTATE,

TO WIT: VEHICLES INCLUDING :

2003 MAZDA PROTÉGÉ

2005 MAZDA 3

1997 FORD F-150

2004 INFINITY FX35

Debtors hereby move the Court for an order to compel the trustee to abandon the assets of property of the estate, to wit: the 2003 Mazda Protégé, 2005 Mazda 3 1997 Ford F-150, 2004 Infinity FX35, hereinafter referred to as Vehicles.

The basis of the motion is that the Vehicles are declared by the debtors as Exempt under CCP703.140(b)(5) in the petition on file with this Court.

1 A portion of the 2004 Infinity , \$4,700.,is actually not exempt, however, the debtor and the
2 trustee have stipulated to a payment to offset that amount.

3 Debtors believe that, in addition to the exemptions claimed, the assets constitute no value to the
4 estate, and may constitute a liability to the estate.

5 This motion is filed in good faith. Debtors have reason to believe that the trustee concurs in this
6 motion.

7 WHEREFORE:

8 Debtors pray the Court compel the trustee to abandon the estate's interest in the said Vehicles.
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12 Dated this 20th DAY OF May 2010

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14 /s/ Timothy J. Walsh
15 TIMOTHY J. WALSH
16 ATTORNEY AT LAW
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